

EATEL

913 South Burnside Avenue
Gonzales, Louisiana 70737-4258

ORIGINAL



June 29, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW, Room TW-B204
Washington, DC 20554

RECEIVED

JUN 30 2004

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 96-128
In the Matter of
The Pay Telephone Reclassification and Compensation
Provisions of the Telecommunications Act of 1996

East Ascension Telephone Company, LLC
System Audit Report

Dear Ms. Dortch:

On behalf of the East Ascension Telephone Co., LLC (the "Company"), attached for filing is the Company's System Audit Report required by Section 64.1320 of the Commission's Rules and Regulations. In compliance with Section 64.1320(e), the person responsible for handling the Company's payphone compensation and for resolving disputes with payphone service providers over compensation is:

Janet S. Britton, Corporate and Regulatory Counsel
East Ascension Telephone Company, LLC
913 South Burnside Avenue
Gonzales, Louisiana 70737
Telephone No. (225) 621-4498

The Company will notify the Commission and affected parties of any change in this information within sixty (60) days of any change in this contact person.

Copies of this filing have been provided to each payphone service provider for which the Company completes calls and each facilities-based long distance carrier from which the Company receives payphone calls.

Sincerely,



JANET S. BRITTON
Corporate and Regulatory Counsel

JSB:ka
Attachment

No. of Copies rec'd 014
List ABCDE



Postlethwaite & Netterville

A Professional Accounting Corporation
Associated Offices in Principal Cities of the United States
www.pncpa.com

INDEPENDENT ACCOUNTANTS' REPORT

Advanced Tel, Inc.
Gonzales, Louisiana

We have examined management's assertion, included in the accompanying Dial Around Compensation report, that Advanced Tel, Inc. d/b/a Eatelnet (EATEL) complied with 64.1310(a)(1) of the Code of Federal Regulations as of June 29, 2004. Management is responsible for EATEL's compliance with 64.1310(a)(1) of the Code of Federal Regulations. Our responsibility is to express an opinion on management's assertion about EATEL's compliance based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence relating to EATEL's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on EATEL's compliance with specified requirements.

In our opinion, management's assertion that EATEL complies with the aforementioned requirements contained in 64.1310 of the Code of Federal Regulations as of June 29, 2004 is fairly stated, in all material respects.

This report is intended solely for the information and use of EATEL, the Federal Communications Commission, the Payphone Service Providers for which EATEL completes calls, and the facilities-based long distance carriers from which EATEL receives payphone calls, and is not intended to be and should not be used by anyone other than these specified parties.

Postlethwaite & Netterville

Baton Rouge, Louisiana
June 29, 2004

Advanced Tel., Inc. Dial Around Compensation

Purpose

In its *Payphone Report and Order* (released October 3, 2003), the FCC created new rules for dial around compensation for payphone service providers (PSPs). These rules requires the either the facilities-based interexchange carrier (IXC) or switched-based reseller that completes a coinless access code or subscriber toll-free payphone call to compensate the PSP for the call. Advanced Tel., Inc., d/b/a Eatelnet; Eatel, is a Completing Carrier and is therefore required to comply with FCC rules established in the aforementioned order.

Carrier Identification Codes

Advanced Tel., Inc. is responsible for dial around compensation for the following CICs: 0389, 5389, and 0544

Call Tracking System

Advanced Tel., Inc. has established and implemented a call tracking system. Call detail records with info digits 27, 29 or 70 are extracted from the DMS500 switch twice daily. Only completed calls where the billing number matches an active Eatel billing account are extracted. Daily files are merged on a weekly basis to a payphone warehouse file. These records are stored in a payphone warehouse file for quarterly processing.

This tracking system identifies:

1. that a call that originates from a payphone (via information digits of 27, 29 or 70);
2. where that call originates and terminates; and
3. whether the call is completed and compensable.

Quarterly Processing

Call detail records that have been stored in the payphone warehouse are processed and matched to the ANI files provided to Advanced Tel by the PSPs each quarter. Summary and detail reports and payments to PSPs are generated upon completion of this process.

Reporting

Advanced Tel will quarterly provide each PSP with a computer readable report that identifies the information below:

1. PSP ANI (originating number)
2. 800# or Access Code (terminating number)
3. call month
4. # of calls; and
5. compensation amount
6. CIC of the facility based carrier will be reported effective July 1, 2004.

Disputes/Verification

Payphone warehouse call detail records are maintained for a minimum of 18 months after the close of a quarter. Call detail records, which includes the date and time of every call identified and reported, are available to a PSP upon request. Compensation disputes should be made within 90 days after receiving compensation. Disputes must be in writing and contain the following information: PSP name; ANI; call date; and reason for dispute. Below is the contact information for all disputes:

Advanced Tel., Inc.
Attn: Liz Veasman
913 S Burnside Avenue
Gonzales, LA 70737
Or liz@eatel.com
Or Fax (225) 644-6325

Effective July 1, 2004, a log of all disputes will be maintained and reviewed by internal legal counsel. The log will contain the date of dispute, the PSP name and status.

Certification

Effective July 1, 2004, each payment will be accompanied by a sworn declaration from the Director of Accounting, who is considered to be the chief financial officer, certifying that the payment amount is accurate and is based on 100% of actual calls completed.

Obligation of Payphone Service Provider

Payphone service providers are responsible for providing Advanced Tel with a list of their payphone ANIs each quarter. ANI lists should be electronic in the standard NPC format. These files will be used to identify the PSP due dial around compensation.

Carrier Certification

I am Assistant Controller. I hereby certify that, effective June 29, 2004, Advanced Tel., Inc. is in compliance with FCC Rules, Section 64.1310, which requires the completing facility-based long distance carrier to compensate payphone service providers for payphone-originated calls. Specifically, Advanced Tel., Inc. has established a call tracking system and had a third party attest that the system accurately tracks payphone calls to completion. Advanced Tel. has procedures in place to pay PSPs directly each quarter and provide PSPs with quarterly reports, in a computer readable format, that support the certified payment amount.

Date:	<u>June 29, 2004</u>
Certifying Signature:	<u>Liz Veasman</u>
Name:	<u>Liz Veasman</u>
Title:	<u>Assistant Controller</u>

Payphone Compensation Contact

Liz Veasman
Advanced Tel, Inc.
913 S Burnside Avenue
Gonzales, LA 70737
Phone #: (225) 621-4280
Fax #: (225) 644-6325
Email: liz@eatel.com

Advanced Tel., Inc.
Active Toll Free Subscriber & Coinless Access Numbers
As of July 1, 2004

Status	Phone Number	Ckt Type
A	8002561252	800
A	8002562433	800
A	8002563236	800
A	8002564337	800
A	8002797696	800
A	8003703040	800
A	8003757570	800
A	8004372476	800
A	8004670634	800
A	8005230657	800
A	8005370302	800
A	8005638143	800
A	8005647809	800
A	8006009189	800
A	8006175589	800
A	8006378594	800
A	8006406090	800
A	8006494669	800
A	8006731541	800
A	8006862820	800
A	8007383366	800
A	8007423215	800
A	8007497313	800
A	8007574562	800
A	8007856518	800
A	8008048543	800
A	8008065072	800
A	8008296437	800
A	8008453533	800
A	8008774608	800
A	8009176466	800
A	8009179299	800
A	8009179599	800
A	8009750074	800
A	8009759830	800
A	8662685454	800
A	8662685463	800
A	8662685467	800
A	8662685475	800
A	8662685481	800
A	8662685483	800
A	8662685757	800
A	8662929390	800
A	8663332835	800
A	8663333600	800
A	8663973105	800
A	8664277967	800
A	8664498853	800
A	8666254100	800
A	8666376212	800

Advanced Tel., Inc.
Active Toll Free Subscriber & Coinless Access Numbers
As of July 1, 2004

Status	Phone Number	Ckt Type
A	8666376214	800
A	8666445800	800
A	8666447690	800
A	8666475252	800
A	8666477999	800
A	8667114375	800
A	8667756999	800
A	8668582597	800
A	8669992375	800
A	8772187847	800
A	8772673619	800
A	8774460128	800
A	8776308955	800
A	8777548020	800
A	8779994141	800
A	8882119111	800
A	8882493678	800
A	8882571251	800
A	8882691398	800
A	8882793967	800
A	8882949909	800
A	8883023365	800
A	8883028585	800
A	8883032835	800
A	8883101939	800
A	8883116615	800
A	8883265178	800
A	8883280009	800
A	8883676832	800
A	8884272617	800
A	8884272706	800
A	8886097161	800
A	8886213850	800
A	8886476736	800
A	8886545216	800
A	8887380774	800
A	8887411434	800
A	8887563049	800
A	8887593798	800
A	8887757990	800
A	8887836111	800
A	8887908988	800
A	8888352895	800